



# County of San Diego

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## **Statement of Reasons for Exemption from Additional Environmental Review and 15183 Checklist Pursuant to CEQA Guidelines §15183**

**Date:** November 12, 2015  
**Project Title:** Brightwater Ranch  
**Record ID:** PDS2003-3100-5306, LOG NO. PDS2003-3910-0314007  
**Plan Area:** Lakeside Community Plan Area  
**GP Designation:** VR-4.3 (33.44 acres) / SR-4 (42.79 acres)  
**Density:** 4.3 du/acre / 1 du/4 acres  
**Zoning:** RS / RR  
**Min. Lot Size:** 10,000 square feet / 1 acre  
**Special Area Reg.:** None  
**Lot Size:** 10,075 to 32,064 square feet  
**Applicant:** Sohail Bokhari, PulteGroup, Inc./CENTEX Homes, 27101 Puerta Real, Suite 300,  
Mission Viejo, CA 92691 (949) 330-8537  
**Staff Contact:** Robert Hingtgen - (858) 694-3712  
Robert.Hingtgen@sdcounty.ca.gov

### **Project Description**

The project is a major subdivision to divide a 76.23-acre property into 71 lots, including 66 residential lots, four HOA lots and one biological resources open space lot. The project site is located at the intersection of Jackson Hill Parkway and Wellington Hill Drive in the Lakeside Community Plan Area. Access to the site would be provided by Jackson Hill Parkway and Wellington Hill Drive. Water and sewer would be provided by Helix Water District and the San Diego County Sanitation District, respectively. Earthwork will consist of 155,550 cubic yards of excavation and fill.

The project site is subject to the Village General Plan Regional Category, and Village Residential (VR-4.3) and Semi-Rural Residential (SR-4) Land Use Designations. Zoning for the site is Residential Single-Family (RS) and Rural Residential (RR). The project is consistent with density and lot size requirements of the General Plan and Zoning Ordinance.

### **Overview**

California Public Resources Code section 21083.3 and California Environmental Quality Act (CEQA) Guidelines Section 15183 provide an exemption from additional environmental review for projects that are consistent with the development density established by existing zoning, community plan or general plan policies for which an Environmental Impact Report (EIR) was certified, except as might be necessary to examine whether there are project-specific significant effects which are peculiar to the project or its site. Section 15183 specifies that examination of environmental effects shall be limited to

those effects that: (1) Are peculiar to the project or the parcel on which the project would be located, and were not analyzed as significant effects in a prior EIR on the zoning action, general plan, or community plan, with which the project is consistent, (2) Are potentially significant off-site impacts and cumulative impacts which were not discussed in the prior EIR prepared for the general plan, community plan or zoning action, or (3) Are previously identified significant effects which, as a result of substantial new information which was not known at the time the EIR was certified, are determined to have a more severe adverse impact than discussed in the prior EIR. Section 15183(c) further specifies that if an impact is not peculiar to the parcel or to the proposed project, has been addressed as a significant effect in the prior EIR, or can be substantially mitigated by the imposition of uniformly applied development policies or standards, then an additional EIR need not be prepared for that project solely on the basis of that impact.

### **General Plan Update Program EIR**

The County of San Diego General Plan Update (GPU) establishes a blueprint for future land development in the unincorporated County that meets community desires and balances the environmental protection goals with the need for housing, agriculture, infrastructure, and economic vitality. The GPU applies to all of the unincorporated portions of San Diego County and directs population growth and plans for infrastructure needs, development, and resource protection. The GPU included adoption of new General Plan elements, which set the goals and policies that guide future development. It also included a corresponding land use map, a County Road Network map, updates to Community and Subregional Plans, an Implementation Plan, and other implementing policies and ordinances. The GPU focuses population growth in the western areas of the County where infrastructure and services are available in order to reduce the potential for growth in the eastern areas. The objectives of this population distribution strategy are to: 1) facilitate efficient, orderly growth by containing development within areas potentially served by the San Diego County Water Authority (SDCWA) or other existing infrastructure; 2) protect natural resources through the reduction of population capacity in sensitive areas; and 3) retain or enhance the character of communities within the unincorporated County. The SDCWA service area covers approximately the western one third of the unincorporated County. The SDWCA boundary generally represents where water and wastewater infrastructure currently exist. This area is more developed than the eastern areas of the unincorporated County, and would accommodate more growth under the GPU.

The GPU EIR was certified in conjunction with adoption of the GPU on August 3, 2011. The GPU EIR comprehensively evaluated environmental impacts that would result from Plan implementation, including information related to existing site conditions, analyses of the types and magnitude of project-level and cumulative environmental impacts, and feasible mitigation measures that could reduce or avoid environmental impacts.

### **Summary of Findings**

The Brightwater Ranch project (PDS2003-3100-5306) is consistent with the analysis performed for the GPU EIR. Further, the GPU EIR adequately anticipated and described the impacts of the proposed project, identified applicable mitigation measures necessary to reduce project specific impacts, and the project implements these mitigation measures (see [http://www.sandiegocounty.gov/content/dam/sdc/pds/gpupdate/docs/BOS\\_Aug2011/EIR/FEIR\\_7.00 - Mitigation Measures 2011.pdf](http://www.sandiegocounty.gov/content/dam/sdc/pds/gpupdate/docs/BOS_Aug2011/EIR/FEIR_7.00_Mitigation_Measures_2011.pdf) for complete list of GPU Mitigation Measures).

A comprehensive environmental evaluation has been completed for the project as documented in the attached §15183 Exemption Checklist. This evaluation concludes that the project qualifies for an exemption from additional environmental review because it is consistent with the development density and use characteristics established by the County of San Diego General Plan, as analyzed by the San Diego County General Plan Update Final Program EIR (GPU EIR, ER #02-ZA-001, SCH #2002111067), and all required findings can be made.

In accordance with CEQA Guidelines §15183, the project qualifies for an exemption because the following findings can be made:

**1. The project is consistent with the development density established by existing zoning, community plan or general plan policies for which an EIR was certified.**

The project would subdivide the 76-acre property into 71 lots including 66 residential lots within the portion of the site with a Land Use Designation of VR-4.3, which is consistent with the development density of the VR-4.3 Land Use Designation established by the General Plan and the certified GPU EIR.

**2. There are no project specific effects which are peculiar to the project or its site, and which the GPU EIR failed to analyze as significant effects.**

The subject property is no different than other properties in the surrounding area, and there are no project specific effects which are peculiar to the project or its site. The project site is located in an area developed with similarly sized, residential lots with associated accessory uses. The property does not support any peculiar environmental features, and the project would not result in any peculiar effects.

In addition, as explained further in the 15183 Checklist below, all project impacts were adequately analyzed by the GPU EIR. The project could result in potentially significant impacts to biological and cultural resources. However, applicable mitigation measures specified within the GPU EIR have been made conditions of approval for this project.

**3. There are no potentially significant off-site and/or cumulative impacts which the GPU EIR failed to evaluate.**

The proposed project is consistent with the density and use characteristics of the development considered by the GPU EIR and would represent a small part of the growth that was forecast for build-out of the General Plan. The GPU EIR considered the incremental impacts of the proposed project, and as explained further in the 15183 Exemption Checklist below, no potentially significant off-site or cumulative impacts have been identified which were not previously evaluated.

**4. There is no substantial new information which results in more severe impacts than anticipated by the GPU EIR.**

As explained in the 15183 exemption checklist below, no new information has been identified which would result in a determination of a more severe impact than what had been anticipated by the GPU EIR.

**5. The project will undertake feasible mitigation measures specified in the GPU EIR.**

As explained in the 15183 exemption checklist below, the project will undertake feasible mitigation measures specified in the GPU EIR. These GPU EIR mitigation measures will be undertaken through project design, compliance with regulations and ordinances, or through the project's conditions of approval.



Signature

  
Date

**Beth Ehsan**

Printed Name

**Project Manager**

Title

## **CEQA Guidelines §15183 Exemption Checklist**

### **Overview**

This checklist provides an analysis of potential environmental impacts resulting from the proposed project. Following the format of CEQA Guidelines Appendix G, environmental effects are evaluated to determine if the project would result in a potentially significant impact triggering additional review under Guidelines section 15183.

- Items checked "Significant Project Impact" indicates that the project could result in a significant effect which either requires mitigation to be reduced to a less than significant level or which has a significant, unmitigated impact.
- Items checked "Impact not identified by GPU EIR" indicates the project would result in a project specific significant impact (peculiar off-site or cumulative that was not identified in the GPU EIR.
- Items checked "Substantial New Information" indicates that there is new information which leads to a determination that a project impact is more severe than what had been anticipated by the GPU EIR.

A project does not qualify for a §15183 exemption if it is determined that it would result in: 1) a peculiar impact that was not identified as a significant impact under the GPU EIR; 2) a more severe impact due to new information; or 3) a potentially significant off-site impact or cumulative impact not discussed in the GPU EIR.

A summary of staff's analysis of each potential environmental effect is provided below the checklist for each subject area. A list of references, significance guidelines, and technical studies used to support the analysis is attached in Appendix A. Appendix B contains a list of GPU EIR mitigation measures.

|                                                                                                                                                          | Significant<br>Project<br>Impact | Impact not<br>identified by GPU<br>EIR | Substantial<br>New<br>Information |
|----------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------|----------------------------------------|-----------------------------------|
| <b>1. AESTHETICS – Would the Project:</b>                                                                                                                |                                  |                                        |                                   |
| a) Have a substantial adverse effect on a scenic vista?                                                                                                  | <input type="checkbox"/>         | <input type="checkbox"/>               | <input type="checkbox"/>          |
| b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway? | <input type="checkbox"/>         | <input type="checkbox"/>               | <input type="checkbox"/>          |
| c) Substantially degrade the existing visual character or quality of the site and its surroundings?                                                      | <input type="checkbox"/>         | <input type="checkbox"/>               | <input type="checkbox"/>          |
| d) Create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area?                                   | <input type="checkbox"/>         | <input type="checkbox"/>               | <input type="checkbox"/>          |

**Discussion**

- 1(a) The project would be visible from public roads and trails; however, the site is not located within a viewshed of a scenic vista.
- 1(b) The property is not within the viewshed of a County or state scenic highway. According to the Visual Analysis for Proposed Brightwater Project prepared by Adam Gevanthor dated January 6, 2015, portions of the off-site improvements to Jackson Ridge Parkway would be visible from I-8, which is a County scenic highway. The change in view will be less than significant due to the short duration of views and the screening provided by required landscaping. The project site itself would not be visible from any scenic highways. The site includes steep slopes, but there would be only minimal encroachment into RPO steep slopes. The project site also does not support any other significant scenic resources that would be lost or modified through development of the property.
- 1(c) The project would be consistent with existing community character. The project is located in the Lakeside Community Plan Area at the intersection Jackson Ridge Parkway and Wellington Hill Drive in an area characterized by single-family residences on similarly sized lots. The addition of 66 new residential lots would not substantially degrade the visual quality of the site or its surroundings.
- 1(d) Residential lighting would be required to conform with the County's Light Pollution Code to prevent spillover onto adjacent properties and minimize impacts to dark skies.

**Conclusion**

As discussed above, the project would not result in any significant impacts to aesthetics; therefore, the project would not result in an impact which was not adequately evaluated by the GPU EIR.

|                                                | Significant<br>Project<br>Impact | Impact not<br>identified by GPU<br>EIR | Substantial<br>New<br>Information |
|------------------------------------------------|----------------------------------|----------------------------------------|-----------------------------------|
| <b>2. Agriculture/Forestry Resources</b>       |                                  |                                        |                                   |
| – Would the Project:                           |                                  |                                        |                                   |
| a) Convert Prime Farmland, Unique Farmland, or | <input type="checkbox"/>         | <input type="checkbox"/>               | <input type="checkbox"/>          |

Farmland of Statewide or Local Importance as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, or other agricultural resources, to a non-agricultural use?

b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?

☐ ☐ ☐

c) Conflict with existing zoning for, or cause rezoning of, forest land, timberland, or timberland zoned Timberland Production?

☐ ☐ ☐

d) Result in the loss of forest land, conversion of forest land to non-forest use, or involve other changes in the existing environment, which, due to their location or nature, could result in conversion of forest land to non-forest use?

☐ ☐ ☐

e) Involve other changes in the existing environment, which, due to their location or nature, could result in conversion of Important Farmland or other agricultural resources, to non-agricultural use?

☐ ☐ ☐

### Discussion

2(a) The project and surrounding properties do not support any Farmland of Local Importance, Prime Farmland, Unique Farmland, or Farmland of Statewide Importance.

2(b) The project site is not located within or adjacent to a Williamson Act contract or agriculturally zoned land.

2(c) There are no timberland production zones on or near the property.

2(d) The project site is not located near any forest lands.

2(e) The project site is not located near any important farmlands or active agricultural production areas.

### Conclusion

As discussed above, the project would not result in any significant impacts to agricultural resources; therefore, the project would not result in an impact which was not adequately evaluated by the GPU EIR.

| Significant<br>Project<br>Impact | Impact not<br>identified by GPU<br>EIR | Substantial<br>New<br>Information |
|----------------------------------|----------------------------------------|-----------------------------------|
|----------------------------------|----------------------------------------|-----------------------------------|

### 3. Air Quality – Would the Project:

a) Conflict with or obstruct implementation of the San Diego Regional Air Quality Strategy (RAQS) or applicable portions of the State Implementation Plan (SIP)?

☐ ☐ ☐

b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?

☐ ☐ ☐

c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?

☐ ☐ ☐

d) Expose sensitive receptors to substantial pollutant concentrations?

☐ ☐ ☐

e) Create objectionable odors affecting a substantial number of people?

☐ ☐ ☐

### Discussion

3(a) The project proposes development that was anticipated and considered by SANDAG growth projections used in development of the RAQS and SIP. As such, the project would not conflict with either the RAQS or the SIP. In addition, the operational emissions from the project are below screening levels, and will not violate any ambient air quality standards.

3(b) Grading operations associated with the construction of the project would be subject to the Grading Ordinance and San Diego Air Pollution Control District's Rule 55-Fugitive Dust Control, which require the implementation of dust control measures. Construction activities would also comply with SDAPCD Rule 67, which requires the use of low-volatile organic compounds in architectural coatings. Emissions from the construction phase would be minimal, temporary and localized, resulting in pollutant emissions below the screening level criteria established by County air quality guidelines for determining significance. Further, all off-road construction equipment would use U.S. Environmental Protection Agency (EPA) approved Tier 2 engines and would be equipped with CARB-approved diesel particulate filters. Tier 2 engines reduce emissions of NOx and diesel particulate filters reduce diesel exhaust emissions. In addition, the project would result in additional vehicle trips associated with the proposed land uses. However, as shown in the air quality study conducted for the project, operational-related emissions would not exceed County screening levels (Appendix A).

3(c) The project would contribute PM10, NOx, and VOCs emissions from construction/grading and operational activities; however, the incremental increase would not exceed established screening thresholds (see question 3(b) above). Further, as described above, construction equipment would be equipped with U.S. EPA Tier 2 engines and diesel particulate filters, further reducing exhaust emissions.

3(d) The proposed Project would develop 66 single-family residential uses, but would not include any of the types of uses that have been identified as sources of air pollution by the California Air Resources Board (CARB). In addition, the Project would not place sensitive receptors within the CARB siting distances of the listed air pollutant sources. Further, Project emissions of PM10 and PM2.5 during operation would be below screening level thresholds (Appendix A). Similarly, the project does not propose uses or activities that would result in exposure of these sensitive receptors to significant pollutant

concentrations and will not place sensitive receptors near any carbon monoxide hotspots.

- 3(e) The project could produce objectionable odors during construction and would not result in any permanent odor sources associated with operations. Odorous emissions disperse rapidly with increasing distance from the source and due to the small scale of construction activities, emissions would be minimal and temporary, ceasing once construction is complete. Therefore, construction related odors would not result in a new odor source that could adversely affect a substantial number of individuals. The Project would not place sensitive receptors within a close proximity to known odor sources. In addition, the residential development would not be a source of odors, as the operation of residential uses is not generally associated with odors. Impacts associated with odor sources are considered less than significant.

### Conclusion

As discussed above, the project would not result in any significant impacts to air quality; therefore, the project would not result in an impact which was not adequately evaluated by the GPU EIR.

|                                                                                                                                                                                                                                                                                           | Significant<br>Project<br>Impact | Impact not<br>identified by<br>GPU EIR | Substantial<br>New<br>Information |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------|----------------------------------------|-----------------------------------|
| <b>4. Biological Resources – Would the Project:</b>                                                                                                                                                                                                                                       |                                  |                                        |                                   |
| Have a substantial adverse effect, either directly or through habitat modifications, on any candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service? | <input type="checkbox"/>         | <input type="checkbox"/>               | <input type="checkbox"/>          |
| b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or US Fish and Wildlife Service?                                      | <input type="checkbox"/>         | <input type="checkbox"/>               | <input type="checkbox"/>          |
| c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?                      | <input type="checkbox"/>         | <input type="checkbox"/>               | <input type="checkbox"/>          |
| d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?                                                        | <input type="checkbox"/>         | <input type="checkbox"/>               | <input type="checkbox"/>          |
| e) Conflict with the provisions of any adopted Habitat Conservation Plan, Natural Communities Conservation                                                                                                                                                                                | <input type="checkbox"/>         | <input type="checkbox"/>               | <input type="checkbox"/>          |



Plan, other approved local, regional or state habitat conservation plan or any other local policies or ordinances that protect biological resources?

### Discussion

4(a) Biological resources on the project site were evaluated in a Biological Resources Report prepared by Karl Osmundson of HELIX Environmental Planning, dated November 5, 2015. The site contains coastal sage scrub, non-native grassland, and jurisdictional drainages. Sensitive wildlife species identified on site were coastal California gnatcatcher, monarch butterfly, orange-throated whiptail, southern California rufous-crowned sparrow, Cooper's hawk, and turkey vulture. Protocol surveys conducted in 2014 detected two pairs of gnatcatchers. One of the detected gnatcatcher locations would be impacted. A 2014 protocol survey for Hermes copper butterfly was negative, and the site is considered unoccupied by the Quino checkerspot butterfly based on a habitat assessment. Sensitive plant species identified onsite were San Diego sunflower (507 individuals) and Coulter's matilija poppy (38 individuals). Three of the San Diego sunflowers would be impacted, while all 38 Coulter's matilija poppies would be avoided. The site is located within the MSCP and is designated as a Pre-approved Mitigation Area (PAMA) due to its location in the Lakeside Archipelago.

As considered by the GPU EIR, project impacts to sensitive habitat and/or species will be mitigated through ordinance compliance and through implementation of the following mitigation measures: on-site preservation of 41.5 acres of gnatcatcher-occupied coastal sage scrub habitat, which also supports raptor foraging; preservation of 504 San Diego sunflowers; and breeding season avoidance to prevent brushing, clearing, and/or grading during the breeding season (March 1 to August 15 for gnatcatchers, January 15 to July 15 for tree-nesting raptors, and February 1 to September 15 for migratory birds). The GPU EIR identified these mitigation measures as Bio 1.6 and Bio 1.7.

4(b) Based on the Biological Resources report, the project site supports 72.6 acres of Diegan coastal sage scrub and 0.3 acre of non-native grassland, as well as 0.11 acre (2,272 linear feet) of non-wetland Waters of the US and State, 0.06 acre (2,755 linear feet) of RWQCB Waters of the State, and 0.28 acre (4,395 linear feet) of CDFW ephemeral streambed. None of the drainage features qualify as RPO wetlands because they occur within upland habitat types and do not support a predominance of hydrophytes, and the substratum is composed of non-hydric sandy loam soil. The sensitive habitat types on-site do qualify as RPO Sensitive Habitat Lands because they support the federally listed California gnatcatcher and because of the location within the Lakeside Archipelago habitat linkage. The project will impact 27.1 acres of coastal sage scrub, 0.05 acre of non-native grassland, 0.11 acre of non-wetland Waters of the US, 0.04 acre (1,765 linear feet) of RWQCB jurisdictional Waters of the State, and 0.24 acre of CDFW ephemeral streambed. As detailed in response a) above, direct and indirect impacts to sensitive natural communities identified in the RPO, BMO, Fish and Wildlife Code, and Endangered Species Act are mitigated through implementation of on-site habitat preservation.

As considered by the GPU EIR, project impacts to coastal sage scrub and non-native grassland will be mitigated through on-site preservation of 41.5 acres of coastal sage scrub within a BRCA in the MSCP. The on-site open space will be protected by a recorded biological open space easement, permanent fencing and open space signs. The biological open space will be surrounded by a 100-foot Limited Building Zone easement to prevent fuel modification from extending into the open space. A final

Resource Management Plan will be required prior to Final Map recordation to ensure the open space is managed and monitored in perpetuity, funded by an endowment to be established by the developer. Impacts to USACE, RWQCB, and CDFW jurisdictional waters will be mitigated at a 1:1 ratio with details to be determined through agency consultation and permitting. The GPU EIR identified these mitigation measures as Bio 1.6 and Bio 1.7.

- 4(c) The proposed project site does not contain any wetlands as defined by Section 404 of the Clean Water Act, therefore, no impacts will occur.
- 4(d) The site is part of a regional linkage/corridor as identified on MSCP maps. The Lakeside Archipelago runs generally north-south and connects core area around Lake Jennings to Crestridge Ecological Preserve and Dehesa. The linkage is constrained and fragmented, such that mammals would be challenged to utilize the linkage to travel to and from core blocks of habitat; however, bird movement occurs. The portion of the site to be preserved in open space is located on the west side of the site where it would preserve lines of sight and the most direct flight path, as well as live-in gnatcatcher habitat. The project would preserve the existing connection width of 860 feet on the northwest and expand up to 1,750 feet on-site. The southern edge of the open space is not directly connected, but would remain usable for bird movement since there is no development proposed in the southern end of the site. Therefore, impacts will be less than significant.
- 4(e) The project is consistent with the MSCP, Biological Mitigation Ordinance, and Resource Protection Ordinance (RPO) because on-site mitigation will be required to compensate for the loss of significant habitat as explained above and in the MSCP Conformance Statement.

### Conclusion

The project could result in potentially significant impacts to biological resources; however, further environmental analysis is not required because:

1. No peculiar impacts to the project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.
4. Feasible mitigation measures contained within the GPU EIR will be applied to the project.

|                                                                                                           | Significant<br>Project<br>Impact | Impact not<br>identified by<br>GPU EIR | Substantial<br>New<br>Information |
|-----------------------------------------------------------------------------------------------------------|----------------------------------|----------------------------------------|-----------------------------------|
| <b>5. Cultural Resources – Would the Project:</b>                                                         |                                  |                                        |                                   |
| a) Cause a substantial adverse change in the significance of a historical resource as defined in 15064.5? | <input type="checkbox"/>         | <input type="checkbox"/>               | <input type="checkbox"/>          |
| b) Cause a substantial adverse change in the significance                                                 | <input type="checkbox"/>         | <input type="checkbox"/>               | <input type="checkbox"/>          |

of an archaeological resource pursuant to 15064.5?

- |                                                                                      |                          |                          |                          |
|--------------------------------------------------------------------------------------|--------------------------|--------------------------|--------------------------|
| c) Directly or indirectly destroy a unique geologic feature?                         | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| d) Directly or indirectly destroy a unique paleontological resource or site?         | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| e) Disturb any human remains, including those interred outside of formal cemeteries? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

### Discussion

5(a) Based on an analysis of records and a survey of the property by County approved archaeologist, Mary Robbins-Wade, it has been determined that there are no historical resources within the subject property. The results of the negative survey are provided in a cultural resources report titled, *Cultural Resources Survey Report - Negative Findings, Brightwater Ranch Project, Lakeside, San Diego County, California* (October 2014), prepared by Mary Robbins-Wade and Kristina Davison.

5(b) Based on an analysis of records and a survey of the property by County approved archaeologist, Mary Robbins-Wade, it has been determined that there are no archaeological resources within the subject property. The results of the negative survey are provided in a cultural resources report titled, *Cultural Resources Survey Report - Negative Findings, Brightwater Ranch Project, Lakeside, San Diego County, California* (October 2014), prepared by Mary Robbins-Wade and Kristina Davison.

The Native American Heritage Commission (NAHC) was contacted for a listing of Native American Tribes whose ancestral lands may be impacted by the project. The NAHC response was received on March 3, 2014, indicating that there were no sites on record with the NAHC. The listed Tribes were contacted on March 24, 2014. Two written responses were received. The Ewiiapaayp Band of Kumeyaay Indians replied in an email dated March 25, 2014, that "the Tribe has no concerns" regarding the project area. The Ipay Nation of Santa Ysabel responded, in an email dated March 28, 2014 to "please have a Kumeyaay monitor for all phases of work and ground disturbing activities related to this project".

Although no cultural resources were discovered during the ground surveys, there is the potential for subsurface deposits because of dense vegetative cover on the property, which limited ground visibility. In addition, there are several recorded archaeological sites located within the vicinity of the project.

As considered by the GPU EIR, potential impacts to cultural resources will be mitigated through ordinance compliance and through implementation of the following conditions: grading monitoring under the supervision of a County-approved archaeologist and a Native American monitor and conformance with the County's Cultural Resource Guidelines if resources are encountered. The GPU EIR identified these mitigation measures as Cul-2.5.

5(c) The site does not contain any unique geologic features that have been listed in the County's Guidelines for Determining Significance for Unique Geology Resources nor does the site support any known geologic characteristics that have the potential to support unique geologic features.

- 5(d) A review of the County's Paleontological Resources Maps and data on San Diego County's geologic formations indicates that the project is located on Cretaceous Plutonic geological formations that have zero sensitivity rating for paleontological resources. Therefore, the project will have no impact to this resource and no grading monitoring for this resource is required.
- 5(e) Based on an analysis of records and archaeological surveys of the property, it has been determined that the project site does not include a formal cemetery or any archaeological resources that might contain interred human remains.

### Conclusion

The project could result in potentially significant impacts to cultural resources; however, further environmental analysis is not required because:

1. No peculiar impacts to the project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.
4. Feasible mitigation measures contained within the GPU EIR will be applied to the project.

|                                                                                                                                                                                                                                                                       | Significant<br>Project<br>Impact | Impact not<br>identified by<br>GPU EIR | Substantial<br>New<br>Information |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------|----------------------------------------|-----------------------------------|
| <b>6. Geology and Soils – Would the Project:</b>                                                                                                                                                                                                                      |                                  |                                        |                                   |
| a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving: rupture of a known earthquake fault, strong seismic ground shaking, seismic-related ground failure, liquefaction, and/or landslides? | <input type="checkbox"/>         | <input type="checkbox"/>               | <input type="checkbox"/>          |
| b) Result in substantial soil erosion or the loss of topsoil?                                                                                                                                                                                                         | <input type="checkbox"/>         | <input type="checkbox"/>               | <input type="checkbox"/>          |
| c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in an on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?                                 | <input type="checkbox"/>         | <input type="checkbox"/>               | <input type="checkbox"/>          |
| d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?                                                                                                                      | <input type="checkbox"/>         | <input type="checkbox"/>               | <input type="checkbox"/>          |
| e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?                                                                                    | <input type="checkbox"/>         | <input type="checkbox"/>               | <input type="checkbox"/>          |

**Discussion**

- 6(a)(i) The project is not located in a fault rupture hazard zone identified by the Alquist-Priolo Earthquake Fault Zoning Act, Special Publication 42, Revised 1997, Fault-Rupture Hazards Zones in California, or located within any other area with substantial evidence of a known fault.
- 6(a)(ii) To ensure the structural integrity of all buildings and structures, the project must conform to the Seismic Requirements as outlined within the California Building Code. Compliance with the California Building Code and the County Building Code will ensure that the project will not result in a significant impact.
- 6(a)(iii) The project site is not within a "Potential Liquefaction Area" as identified in the County Guidelines for Determining Significance for Geologic Hazards. In addition, the site is not underlain by poor artificial fill or located within a floodplain.
- 6(a)(iv) The site is located within a "Landslide Susceptibility Area" as identified in the County Guidelines for Determining Significance for Geologic Hazards. Geotechnical Reports prepared by Geocon, Inc. dated October 11, 2005, June 23, 2014, and September 8, 2014 on file with Planning & Development Services has determined that the area does not show evidence of either pre-existing or potential conditions that could become unstable and result in landslides and the potential for landslides at the site is considered low. Also, the reports indicated the proposed cut slopes at an inclination of 1.5:1 will be stable and will not endanger public or private property or result in deposition on public ways or interfere with existing drainage courses provided the recommendations within the reports are followed. Therefore, there will be no potentially significant impact from the exposure of people or structures to adverse effects from adverse effects of landslides.
- 6(b) According to the Soil Survey of San Diego County, the soils on-site are identified as Ramona sandy loam, 9 to 15 percent slopes eroded, Vista coarse sandy loam, 15 to 30 percent slopes, and Vista rocky coarse sandy loam, 30 to 65 percent slopes, that has a soil erodibility rating of moderate to severe. However, the project will not result in substantial soil erosion or the loss of topsoil because the project will be required to comply with the Watershed Protection Ordinance (WPO) and Grading Ordinance which will ensure that the project would not result in any unprotected erodible soils, will not alter existing drainage patterns, and will not develop steep slopes. Additionally, the project will be required to implement Best Management Practices (BMPs) to prevent fugitive sediment.
- 6(c) The project is not located on or near geological formations that are unstable or would potentially become unstable as a result of the project. Geotechnical Reports prepared by Geocon, Inc. dated October 11, 2005, June 23, 2014, and September 8, 2014 on file with Planning & Development Services has determined that the area does not show evidence of either pre-existing or potential conditions that could become unstable and result in landslides and the potential for landslides at the site is considered low. Also, the reports indicated the proposed cut slopes at an inclination of 1.5:1 will be stable and will not endanger public or private property or result in deposition on public ways or interfere with existing drainage courses provided the recommendations within the reports are followed.
- 6(d) The project is underlain by Ramona sandy loam, 9 to 15 percent slopes eroded, Vista coarse sandy loam, 15 to 30 percent slopes, and Vista rocky coarse sandy loam, 30 to

65 percent slopes, which are not considered to be an expansive soil as defined within Table 18-I-B of the Uniform Building Code (1994). The soils have a shrink-swell behavior of low to moderate. The project will not result in a significant impact because compliance with the Building Code and implementation of standard engineering techniques will ensure structural safety.

- 6(e) The project will rely on public water and sewer for the disposal of wastewater. No septic tanks or alternative wastewater disposal systems are proposed.

### Conclusion

As discussed above, the project would not result in any significant impacts to/from geology/soils; therefore, the project would not result in an impact which was not adequately evaluated by the GPU EIR.

|                                                                                                                                  | Significant<br>Project<br>Impact | Impact not<br>identified by<br>GPU EIR | Substantial<br>New<br>Information |
|----------------------------------------------------------------------------------------------------------------------------------|----------------------------------|----------------------------------------|-----------------------------------|
| <b>7. Greenhouse Gas Emissions – Would the Project:</b>                                                                          |                                  |                                        |                                   |
| a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?      | <input type="checkbox"/>         | <input type="checkbox"/>               | <input type="checkbox"/>          |
| b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases? | <input type="checkbox"/>         | <input type="checkbox"/>               | <input type="checkbox"/>          |

### Discussion

- 7(a) A GHG analysis was conducted for the proposed project and is included in Appendix A. The analysis was conducted according to San Diego County Recommended Approach for Addressing Climate Change (2015).

The project would generate GHG emissions through construction activities, operational vehicle trips, and indirect emissions from waste generation and water, natural gas, and electricity demand. Based on the emissions modeling that was conducted total annual GHG emissions are anticipated to be 1,494 MT CO<sub>2</sub>e/year, which would exceed the 900 MT CO<sub>2</sub>e/year screening level for which projects would not be required to conduct a GHG analysis. For projects in this scenario, the recommended approach is to compare the project's unmitigated emissions to the mitigated project emissions. The unmitigated scenario represents the proposed project as described in the application, in compliance with any applicable standards and regulations and the mitigated project would include all State-approved GHG reduction measures as well as incorporated project design features. A threshold of 16 percent below unmitigated conditions was used to evaluate the significance of GHG emissions attributable to the project. If compared to the unmitigated project, proposed mitigation reduces GHG emissions by at least 16 percent, this level of mitigation would represent a fair share of what is necessary statewide to achieve AB 32 target.

The project includes design features that would reduce operational-related GHG emissions. These include designing the project to meet or exceed 2013 Title 24 energy efficiency standard and restricting residential buildings to the use of natural gas

fireplaces rather than traditional wood burning ones. Further, State measures such as Low Carbon Fuel Standard, Pavley II, and Renewable Portfolio Standard would also result in reductions in GHG. As a result, the mitigated project would reduce emissions by 17.2 percent above the unmitigated project (Appendix A). Therefore, it is determined that the proposed project would be consistent with the goals of AB 32. GHG emissions associated with the proposed project would not be considered a significant impact.

- 7(b) As described above, the project would not result in a cumulatively considerable contribution to global climate change. As such, the project would be consistent with County goals and policies included in the County General Plan that address greenhouse gas reductions. Therefore, the project would be consistent with emissions reduction targets of Assembly Bill 32, the Global Warming Solutions Act. Thus, the project would not conflict with any applicable plan, policy or regulation adopted for the purpose of reducing emissions of greenhouse gas emissions.

### Conclusion

As discussed above, the project would not result in any significant impacts to greenhouse gas emissions; therefore, the project would not result in an impact which was not adequately evaluated by the GPU EIR.

|                                                                                                                                                                                                                                                                                                                 | Significant<br>Project<br>Impact | Impact not<br>identified by<br>GPU EIR | Substantial<br>New<br>Information |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------|----------------------------------------|-----------------------------------|
| <b>8. Hazards and Hazardous Materials – Would the Project:</b>                                                                                                                                                                                                                                                  |                                  |                                        |                                   |
| a) Create a significant hazard to the public or the environment through the routine transport, storage, use, or disposal of hazardous materials or wastes or through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?                    | <input type="checkbox"/>         | <input type="checkbox"/>               | <input type="checkbox"/>          |
| b) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?                                                                                                                                                 | <input type="checkbox"/>         | <input type="checkbox"/>               | <input type="checkbox"/>          |
| c) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5, or is otherwise known to have been subject to a release of hazardous substances and, as a result, would it create a significant hazard to the public or the environment? | <input type="checkbox"/>         | <input type="checkbox"/>               | <input type="checkbox"/>          |
| d) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?                                                | <input type="checkbox"/>         | <input type="checkbox"/>               | <input type="checkbox"/>          |
| e) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or                                                                                                                                                                                  | <input type="checkbox"/>         | <input type="checkbox"/>               | <input type="checkbox"/>          |

working in the project area?

f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

☐ ☐ ☐

g) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

☐ ☐ ☐

h) Propose a use, or place residents adjacent to an existing or reasonably foreseeable use that would substantially increase current or future resident's exposure to vectors, including mosquitoes, rats or flies, which are capable of transmitting significant public health diseases or nuisances?

☐ ☐ ☐

### Discussion

8(a) The project will not create a significant hazard to the public or the environment because it does not propose the storage, use, transport, emission, or disposal of Hazardous Substances, nor are Hazardous Substances proposed or currently in use in the immediate vicinity. In addition, the project does not propose to demolish any existing structures onsite which could produce a hazard related to the release of asbestos, lead based paint or other hazardous materials.

8(b) The project is not located within one-quarter mile of an existing or proposed school and does not propose to emit hazardous emissions or handle hazardous or acutely hazardous materials.

8(c) A Phase I Environmental Site Assessment was conducted by Geocon (Geocon, March 18, 2014) to identify the presence of hazardous substances or petroleum products in the soil, groundwater or surface water related to the existing or historic use. The Phase I consisted of site reconnaissance, a description of the historical site conditions, an interview with the site owner, a review of records and a summary report. The records search did not show the property listed in any hazardous materials databases. The Phase I concluded that there is no evidence of existing or historic contamination on or adjacent to the site.

8(d) The proposed project is not located within an Airport Land Use Compatibility Plan (ALUCP), an Airport Influence Area, or a Federal Aviation Administration Height Notification Surface. Also, the project does not propose construction of any structure equal to or greater than 150 feet in height, constituting a safety hazard to aircraft and/or operations from an airport or heliport. A Determination of No Hazard to Air Navigation form from the FAA dated January 15, 2015 is included in the project record.

8(e) The proposed project is not within one mile of a private airstrip.

8(f)(i) OPERATIONAL AREA EMERGENCY PLAN AND MULTI-JURISDICTIONAL HAZARD MITIGATION PLAN: The project will not interfere with this plan because it will not prohibit subsequent plans from being established or prevent the goals and objectives of existing plans from being carried out.



8(f)(ii) **SAN DIEGO COUNTY NUCLEAR POWER STATION EMERGENCY RESPONSE PLAN:** The property is not within the San Onofre emergency planning zone.

8(f)(iii) **OIL SPILL CONTINGENCY ELEMENT:** The project is not located along the coastal zone.

8(f)(iv) **EMERGENCY WATER CONTINGENCIES ANNEX AND ENERGY SHORTAGE RESPONSE PLAN:** The project would not alter major water or energy supply infrastructure which could interfere with the plan.

8f)(v) **DAM EVACUATION PLAN:** The project is not located within a dam inundation zone.

8(g) The proposed project is adjacent to wildlands that have the potential to support wildland fires. However, the project will not expose people or structures to a significant risk of loss, injury or death involving wildland fires because the project will comply with the regulations relating to emergency access, water supply, and defensible space specified in the Consolidated Fire Code, as described in the approved Fire Protection Plan prepared for the project by David Bacon of Firewise 2000, Inc. Also, a Fire Service Availability Letter dated May 13, 2014 has been received from the Lakeside Fire Protection District which indicates the expected emergency travel time to the project site to be 4.5 minutes which is within the 5 minute maximum travel time allowed by the County Public Facilities Element.

8(h) The project does not involve or support uses that would allow water to stand for a period of 72 hours or more (e.g. artificial lakes, agricultural ponds). Also, the project does not involve or support uses that will produce or collect animal waste, such as equestrian facilities, agricultural operations (chicken coops, dairies etc.), solid waste facility or other similar uses. Moreover, based on a site visit conducted by County staff, there are none of these uses on adjacent properties.

### Conclusion

As discussed above, the project would not result in any significant impacts to/from hazards/hazardous materials; therefore, the project would not result in an impact which was not adequately evaluated by the GPU EIR.

|                                                                                                                                                                                                                                    | Significant<br>Project<br>Impact | Impact not<br>identified by<br>GPU EIR | Substantial<br>New<br>Information |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------|----------------------------------------|-----------------------------------|
| <b>9. Hydrology and Water Quality – Would the Project:</b>                                                                                                                                                                         |                                  |                                        |                                   |
| a) Violate any waste discharge requirements?                                                                                                                                                                                       | <input type="checkbox"/>         | <input type="checkbox"/>               | <input type="checkbox"/>          |
| b) Is the project tributary to an already impaired water body, as listed on the Clean Water Act Section 303(d) list? If so, could the project result in an increase in any pollutant for which the water body is already impaired? | <input type="checkbox"/>         | <input type="checkbox"/>               | <input type="checkbox"/>          |
| c) Could the proposed project cause or contribute to an exceedance of applicable surface or groundwater receiving water quality objectives or degradation of beneficial uses?                                                      | <input type="checkbox"/>         | <input type="checkbox"/>               | <input type="checkbox"/>          |

- |                                                                                                                                                                                                                                                                                                                                                                                               |                          |                          |                          |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|--------------------------|--------------------------|
| d) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| e) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?                                                                                                                                                            | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| f) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?                                                                                                                     | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| g) Create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems?                                                                                                                                                                                                                                                                     | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| h) Provide substantial additional sources of polluted runoff?                                                                                                                                                                                                                                                                                                                                 | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| i) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map, including County Floodplain Maps?                                                                                                                                                                                        | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| j) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?                                                                                                                                                                                                                                                                                           | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| k) Expose people or structures to a significant risk of loss, injury or death involving flooding?                                                                                                                                                                                                                                                                                             | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| l) Expose people or structures to a significant risk of loss, injury or death involving flooding as a result of the failure of a levee or dam?                                                                                                                                                                                                                                                | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| m) Inundation by seiche, tsunami, or mudflow?                                                                                                                                                                                                                                                                                                                                                 | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

### Discussion

- 9(a) The project will require a NPDES General Permit for Discharges of Storm Water Associated with Construction Activities. The project applicant has provided a Stormwater Management Plan (SWMP) which demonstrates that the project will comply with all requirements of the WPO. The project will be required to implement site design measures, source control BMPs, and/or treatment control BMPs to reduce potential pollutants to the maximum extent practicable. These measures will enable the project to meet waste discharge requirements as required by the San Diego Municipal Permit, as

implemented by the San Diego County Jurisdictional Urban Runoff Management Program (JURMP) and Standard Urban Storm Water Mitigation Plan (SUSMP).

- 9(b) The project lies in the El Cajon (907.13) and Coches (907.14) hydrologic subareas, within the San Diego hydrologic unit. There are no impaired water bodies according to the Clean Water Act Section 303(d) list. The project will comply with the WPO and implement site design measures, source control BMPs, and treatment control BMPs to prevent a significant increase of pollutants to receiving waters.
- 9(c) As stated in responses 9(a) and 9(b) above, implementation of BMPs and compliance with required ordinances will ensure that project impacts are less than significant.
- 9(d) The project will obtain its water supply from the Helix Water District that obtains water from surface reservoirs or other imported sources. The project will not use any groundwater. In addition, the project does not involve operations that would interfere substantially with groundwater recharge.
- 9(e) As outlined in the project's SWMP, the project will implement source control and/or treatment control BMP's to reduce potential pollutants, including sediment from erosion or siltation, to the maximum extent practicable from entering storm water runoff.
- 9(f) The project will not significantly alter established drainage patterns or significantly increase the amount of runoff for the following reasons: based on a Drainage Study prepared by Project Design Consultants on April 20, 2015, drainage will be conveyed to either natural drainage channels or approved drainage facilities.
- 9(g) The project does not propose to create or contribute runoff water that would exceed the capacity of existing or planned storm water drainage systems.
- 9(h) The project has the potential to generate pollutants; however, site design measures, source control BMPs, and treatment control BMPs will be employed such that potential pollutants will be reduced to the maximum extent practicable.
- 9(i) No FEMA mapped floodplains, County-mapped floodplains or drainages with a watershed greater than 25 acres were identified on the project site or off-site improvement locations.
- 9(j) No 100-year flood hazard areas were identified on the project site or offsite improvement locations.
- 9(k) The project site lies outside any identified special flood hazard area.
- 9(l) The project site lies outside a mapped dam inundation area for a major dam/reservoir within San Diego County. In addition, the project is not located immediately downstream of a minor dam that could potentially flood the property.
- 9(m)(i) SEICHE: The project site is not located along the shoreline of a lake or reservoir.
- 9(m)(ii) TSUNAMI: The project site is not located in a tsunami hazard zone.
- 9(m)(iii) MUDFLOW: Mudflow is type of landslide. See response to question 6(a)(iv).

**Conclusion**

As discussed above, the project would not result in any significant impacts to/from hydrology/water quality; therefore, the project would not result in an impact which was not adequately evaluated by the GPU EIR.

|                                                                                                                                                                                                                                                                                                             | Significant<br>Project<br>Impact | Impact not<br>identified by<br>GPU EIR | Substantial<br>New<br>Information |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------|----------------------------------------|-----------------------------------|
| <b>10. Land Use and Planning – Would the Project:</b>                                                                                                                                                                                                                                                       |                                  |                                        |                                   |
| a) Physically divide an established community?                                                                                                                                                                                                                                                              | <input type="checkbox"/>         | <input type="checkbox"/>               | <input type="checkbox"/>          |
| b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect? | <input type="checkbox"/>         | <input type="checkbox"/>               | <input type="checkbox"/>          |

**Discussion**

10(a) The project does not propose the introduction of new infrastructure such as major roadways, water supply systems, or utilities to the area.

10(b) The project would not conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect, including policies of the General Plan and Community Plan.

**Conclusion**

As discussed above, the project would not result in any significant impacts to land use/planning; therefore, the project would not result in an impact which was not adequately evaluated by the GPU EIR.

|                                                                                                                                                                       | Significant<br>Project<br>Impact | Impact not<br>identified by<br>GPU EIR | Substantial<br>New<br>Information |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------|----------------------------------------|-----------------------------------|
| <b>11. Mineral Resources – Would the Project:</b>                                                                                                                     |                                  |                                        |                                   |
| a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?                                | <input type="checkbox"/>         | <input type="checkbox"/>               | <input type="checkbox"/>          |
| b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan? | <input type="checkbox"/>         | <input type="checkbox"/>               | <input type="checkbox"/>          |

11(a) The project site has been classified by the California Department of Conservation – Division of Mines and Geology as resources potentially present (MRZ-3). However, the project site is surrounded by residential uses including a mobile home park which are incompatible to future extraction of mineral resources on the project site. A future mining operation at the project site would likely create a significant impact to neighboring properties for issues such as noise, air quality, traffic, and possibly other impacts. Therefore, the project will not result in the loss of a known mineral resource because the resource has already been lost due to incompatible land uses.

- 11(b) The project site is not located in an Extractive Use Zone (S-82), nor does it have an Impact Sensitive Land Use Designation (24) with an Extractive Land Use Overlay (25).

### Conclusion

As discussed above, the project would not result in any significant impacts to mineral resources; therefore, the project would not result in an impact which was not adequately evaluated by the GPU EIR.

|                                                                                                                                                                                                                                                                     | Significant<br>Project<br>Impact | Impact not<br>identified by GPU<br>EIR | Substantial<br>New<br>Information |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------|----------------------------------------|-----------------------------------|
| <b>12. Noise – Would the Project:</b>                                                                                                                                                                                                                               |                                  |                                        |                                   |
| a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?                                                                                 | <input type="checkbox"/>         | <input type="checkbox"/>               | <input type="checkbox"/>          |
| b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?                                                                                                                                                             | <input type="checkbox"/>         | <input type="checkbox"/>               | <input type="checkbox"/>          |
| c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?                                                                                                                                      | <input type="checkbox"/>         | <input type="checkbox"/>               | <input type="checkbox"/>          |
| d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?                                                                                                                          | <input type="checkbox"/>         | <input type="checkbox"/>               | <input type="checkbox"/>          |
| e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels? | <input type="checkbox"/>         | <input type="checkbox"/>               | <input type="checkbox"/>          |
| f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?                                                                                                      | <input type="checkbox"/>         | <input type="checkbox"/>               | <input type="checkbox"/>          |

### Discussion

- 12(a) The area surrounding the project site consists of single family residences including a mobile home park adjacent to the south. The project will not expose people to potentially significant noise levels that exceed the allowable limits of the General Plan, Noise Ordinance, or other applicable standards for the following reasons:

General Plan – Noise Element: Policy 4b addresses noise sensitive areas and requires projects to comply with a Community Noise Equivalent Level (CNEL) of 60 decibels (dBA). Projects which could produce noise in excess of 60 dB(A) are required to incorporate design measures or mitigation as necessary to comply with the Noise Element. Based on a review of the County's noise contour maps, the project is not

expected to expose existing or planned noise sensitive areas to noise in excess of 60 dB(A).

Noise Ordinance – Section 36-404: Non-transportation noise generated by the project is not expected to exceed the standards of the Noise Ordinance at or beyond the project's property line. The site is zoned RS that has a one-hour average sound limit of 50 dBA daytime and 45 dBA nighttime. The adjacent properties are zoned RS, RR, RMH6, and RV which have the same daytime and nighttime sound limits. The project does not involve any noise producing equipment that would exceed applicable noise levels at the adjoining property line.

Noise Ordinance – Section 36-410: The project will not generate construction noise in excess of Noise Ordinance standards. Construction operations will occur only during permitted hours of operation. Also, it is not anticipated that the project will operate construction equipment in excess of an average sound level of 75dB between the hours of 7 AM and 7 PM.

- 12(b) The project proposes residential uses which are sensitive to low ambient vibration. However, the project site is well in excess of more than 600 feet from any public road or transit Right-of-Way with projected noise contours of 65 dB or more; any property line for parcels zoned industrial or extractive use; or any permitted extractive uses. A setback of 600 feet ensures that the operations do not have any chance of being impacted by groundborne vibration or groundborne noise levels (Harris, Miller Miller and Hanson Inc., Transit Noise and Vibration Impact Assessment 1995).
- 12(c) As indicated in the response listed under Section 12(a), the project would not expose existing or planned noise sensitive areas in the vicinity to a substantial permanent increase in noise levels that exceed the allowable limits of any applicable noise standards. Also, the project is not expected to expose existing or planned noise sensitive areas to noise 10 dB CNEL over existing ambient noise levels.
- 12(d) The project does not involve any operational uses that may create substantial temporary or periodic increases in ambient noise levels in the project vicinity. Also, general construction noise is not expected to exceed the construction noise limits of the Noise Ordinance. Construction operations will occur only during permitted hours of operation. Also, the project will not operate construction equipment in excess of 75 dB for more than eight hours during a 24 hour period.
- 12(e) The project is not located within an Airport Land Use Compatibility Plan (ALUCP) for airports or within 2 miles of a public airport or public use airport.
- 12(f) The project is not located within a one-mile vicinity of a private airstrip.

### Conclusion

As discussed above, the project would not result in any significant impacts to/from noise; therefore, the project would not result in an impact which was not adequately evaluated by the GPU EIR.

|                                  |                                        |                                   |
|----------------------------------|----------------------------------------|-----------------------------------|
| Significant<br>Project<br>Impact | Impact not<br>identified by<br>GPU EIR | Substantial<br>New<br>Information |
|----------------------------------|----------------------------------------|-----------------------------------|

**13. Population and Housing – Would the Project:**

a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

☐ ☐ ☐

b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?

☐ ☐ ☐

c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?

☐ ☐ ☐
**Discussion**

13(a) The project will not induce substantial population growth in an area because the project does not propose any physical or regulatory change that would remove a restriction to or encourage population growth in an area.

13(b) The project will not displace existing housing.

13(c) The proposed project will not displace a substantial number of people since the site is currently vacant.

**Conclusion**

As discussed above, the project would not result in any significant impacts to populations/housing; therefore, the project would not result in an impact which was not adequately evaluated by the GPU EIR.

| Significant<br>Project<br>Impact | Impact not<br>identified by<br>GPU EIR | Substantial<br>New<br>Information |
|----------------------------------|----------------------------------------|-----------------------------------|
|----------------------------------|----------------------------------------|-----------------------------------|

**14. Public Services – Would the Project:**

a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance service ratios for fire protection, police protection, schools, parks, or other public facilities?

☐ ☐ ☐
**Discussion**

14(a) Based on the project's service availability forms, the project would not result in the need for significantly altered services or facilities.

**Conclusion**

As discussed above, the project would not result in any significant impacts to public services; therefore, the project would not result in an impact which was not adequately evaluated by the GPU EIR.

|                                                                                                                                                                                                                | Significant<br>Project<br>Impact | Impact not<br>identified by<br>GPU EIR | Substantial<br>New<br>Information |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------|----------------------------------------|-----------------------------------|
| <b>15. Recreation – Would the Project:</b>                                                                                                                                                                     |                                  |                                        |                                   |
| a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated? | <input type="checkbox"/>         | <input type="checkbox"/>               | <input type="checkbox"/>          |
| b) Does the project include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?                       | <input type="checkbox"/>         | <input type="checkbox"/>               | <input type="checkbox"/>          |

**Discussion**

15(a) The project would incrementally increase the use of existing parks and other recreational facilities; however, the project will be required to pay fees or dedicate land for local parks pursuant to the Park Land Dedication Ordinance.

15(b) The project includes a pathway along the onsite portion of Wellington Hill Drive. Impacts from these amenities have been considered as part of the overall environmental analysis contained elsewhere in this document.

**Conclusion**

As discussed above, the project would not result in any significant impacts to recreation; therefore, the project would not result in an impact which was not adequately evaluated by the GPU EIR.

|                                                                                                                                                                                                                                                                                                                                                                                                                                  | Significant<br>Project<br>Impact | Impact not<br>identified by<br>GPU EIR | Substantial<br>New<br>Information |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------|----------------------------------------|-----------------------------------|
| <b>16. Transportation and Traffic – Would the Project:</b>                                                                                                                                                                                                                                                                                                                                                                       |                                  |                                        |                                   |
| a) Conflict with an applicable plan, ordinance or policy establishing measures of the effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths and mass transit? | <input type="checkbox"/>         | <input type="checkbox"/>               | <input type="checkbox"/>          |
| b) Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?                                                                                                                                                                   | <input type="checkbox"/>         | <input type="checkbox"/>               | <input type="checkbox"/>          |
| c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that                                                                                                                                                                                                                                                                                                       | <input type="checkbox"/>         | <input type="checkbox"/>               | <input type="checkbox"/>          |



results in substantial safety risks?

d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

☐☐☐

e) Result in inadequate emergency access?

☐☐☐

f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?

☐☐☐

### Discussion

16(a) The project will result in an additional 792 ADT. However, the project will not conflict with any established performance measures because the project trips do not exceed the thresholds established by County guidelines. In addition, the project would not conflict with policies related to non-motorized travel such as mass transit, pedestrian or bicycle facilities.

16(b) The additional 792 ADTs from the project do not exceed the 2400 trips (or 200 peak hour trips) required for study under the region's Congestion Management Program as developed by SANDAG.

16(c) The proposed project is located outside of an Airport Influence Area, is not located within two miles of a public or private use airport, will not alter traffic patterns, and is not a hazard to air navigation as determined by the FAA.

16(d) The proposed project will not alter roadway design, place incompatible uses (e.g., farm equipment) on existing roadways, or create curves, slopes or walls which would impede adequate sight distance on a road.

16(e) The Lakeside Fire Protection District and the San Diego County Fire Authority have reviewed the project and its Fire Protection Plan and have determined that there is adequate emergency fire access.

16(f) The project will not result in the construction of any road improvements or new road design features that would interfere with the provision of public transit, bicycle or pedestrian facilities. In addition, the project does not generate sufficient travel demand to increase demand for transit, pedestrian or bicycle facilities.

### Conclusion

As discussed above, the project would not result in any significant impacts to transportation/traffic; therefore, the project would not result in an impact which was not adequately evaluated by the GPU EIR.

|                                           |                                                 |                                            |
|-------------------------------------------|-------------------------------------------------|--------------------------------------------|
| <b>Significant<br/>Project<br/>Impact</b> | <b>Impact not<br/>identified by<br/>GPU EIR</b> | <b>Substantial<br/>New<br/>Information</b> |
|-------------------------------------------|-------------------------------------------------|--------------------------------------------|

**17. Utilities and Service Systems – Would the Project:**

- |                                                                                                                                                                                                                                    |                          |                          |                          |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|--------------------------|--------------------------|
| a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?                                                                                                                                | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?                             | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?                                      | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?                                                                             | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| e) Result in a determination by the wastewater treatment provider, which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?                                                                                                             | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| g) Comply with federal, state, and local statutes and regulations related to solid waste?                                                                                                                                          | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

**Discussion**

- 17(a) The project would discharge domestic waste to a community sewer system that is permitted to operate by the Regional Water Quality Control Board (RWQCB). A project facility availability form has been received from the San Diego County Sanitation District that indicates that there is adequate capacity to serve the project.
- 17(b) The project involves new water and wastewater pipeline extensions. However, these extensions will not result in additional adverse physical effects beyond those already identified in other sections of this environmental analysis.
- 17(c) The project involves new storm water drainage facilities. However, these improvements will not result in additional adverse physical effects beyond those already identified in other sections of this environmental analysis.
- 17(d) A Service Availability Letter from the Helix Water District has been provided which indicates that there is adequate water to serve the project.
- 17(e) A Service Availability Letter from the San Diego County Sanitation District has been provided, which indicates that there is adequate wastewater capacity to serve the project.

17(f) All solid waste facilities, including landfills require solid waste facility permits to operate. There are five, permitted active landfills in San Diego County with remaining capacity to adequately serve the project.

17(g) The project will deposit all solid waste at a permitted solid waste facility.

**Conclusion**

As discussed above, the project would not result in any significant impacts to utilities and service systems; therefore, the project would not result in an impact which was not adequately evaluated by the GPU EIR.

**Attachments:**

Appendix A – References

Appendix B – Summary of Determinations and Mitigation within the Final Environmental Impact Report, County of San Diego General Plan Update, SCH # 2002111067

## Appendix A

The following is a list of project specific technical studies used to support the analysis of each potential environmental effect:

HELIX Environmental Planning, Joanne Dramko, March 2015. Air Quality and Greenhouse Gas Analysis Report

HELIX Environmental Planning, Stacy Nigro, March 23, 2015. Brightwater Ranch Biological Open Space Preserve – Resource Management Plan

Helix Environmental Planning, Karl Osmundson, November 5, 2015. Brightwater Ranch Biological Technical Report

Affinis, Mary Robbins-Wade and Kristina Davison, October 2014. Cultural Resources Survey Report - Negative Findings, Brightwater Ranch Project, Lakeside, San Diego County, California

Firewise 2000, Inc., David Bacon, January 29, 2015. Brightwater Fire Protection Plan – Fuel Treatment Location Map

Firewise 2000, Inc., David Bacon, October 27, 2014. Brightwater Development Fire Protection Plan

Geocon, Inc., Trevor Myers and David Evans, September 8, 2014. Response to Geotechnical Report Review Comments, Brightwater Ranch

Geocon, Inc., Trevor Myers and David Evans, June 23, 2014. Updated Geotechnical Report, Brightwater Ranch

Geocon, Inc., Trevor Myers and David Evans, October 11, 2005. Geotechnical Investigation, Los Coches I, Brightwater Ranch

Geocon, Inc., Crystal Castellanos and Mukesh Mehta, March 18, 2014. Phase 1 Environmental Site Assessment

FAA, Paul Holmquist, Jan. 15, 2015. Aeronautical Study No. 2014-AWP-7813-OE

Phase I Environmental Site Assessment was conducted by Geocon (Geocon, March 18, 2014)

Project Design Consultants, Debby Reece, April 20, 2015. Major Stormwater Management Plan

Project Design Consultants, Debby Reece, April 20, 2015. CEQA Drainage Study

Project Design Consultants, Debby Reece, January 29, 2015. Preliminary Hydromodification Management Study

Project Design Consultants, Gregory Shields, February 6, 2015. Preliminary Sewer Study

Project Design Consultants, Gregory Shields, March 27, 2015. Preliminary Grading Plan

Project Design Consultants, Gregory Shields, April 24, 2015. Tentative Map

GMP Landscape, Architecture and Planning, February 9, 2015. Conceptual Landscape Plan

Linscott Law & Greenspan, Walter Musial, January 29, 2015. Brightwater Ranch Roundabout Review

Linscott Law & Greenspan, Walter Musial, September 3, 2014. Brightwater Ranch Traffic Impact Analysis

Development Design Services & Graphic Access, Inc., Adam Gevanthor, January 6, 2015. Visual Analysis for Proposed Brightwater Project

For a complete list of technical studies, references, and significance guidelines used to support the analysis of the General Plan Update Final Certified Program EIR, dated August 3, 2011, please visit the County's website at:

[http://www.sdcounty.ca.gov/PDS/gpupdate/docs/BOS\\_Aug2011/EIR/FEIR\\_5.00 -  
References\\_2011.pdf](http://www.sdcounty.ca.gov/PDS/gpupdate/docs/BOS_Aug2011/EIR/FEIR_5.00_-_References_2011.pdf)

## Appendix B

A Summary of Determinations and Mitigation within the Final Environmental Impact Report, County of San Diego General Plan Update, SCH # 2002111067 is available on the Planning and Development Services website at:

[http://www.sdcountry.ca.gov/pds/gpupdate/GPU FEIR Summary 15183 Reference.pdf](http://www.sdcountry.ca.gov/pds/gpupdate/GPU_FEIR_Summary_15183_Reference.pdf)